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MAR 21 2001

US EPA RECORDS CENTER REGION 5



466698

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March 14, 2001

U.S. Environmental Protection Agency
c/o Ms. Deena Shepherd-Johnson, SR-6J
Remedial Enforcement Support Section
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: Chemical Recovery Systems Site, Elyria, Ohio ("Site"), General Notice of Potential Liability and Request for Information, Superior Industries, Inc. ("Superior")

Dear Ms. Shepherd-Johnson:

The purpose of this letter is to respond to your letter and request for information dated March 2, 2001, regarding the above-referenced site. Your letter states that Superior has been designated a potentially responsible party ("PRP") for releases of hazardous substances from the Chemical Recovery Systems' site in Ohio. In addition, your letter request that Superior notify you within ten days of receipt of your letter of its willingness to perform or finance additional remedial activities that the EPA plans to conduct at the site. Further, your letter states that if Superior does not timely respond, the EPA will assume that it does not wish to negotiate a resolution and has declined any involvement in performing the response activities planned by the EPA.

Preliminary investigation and review of records by Superior personnel indicates that Superior has no connection to the Site whatsoever. Hazardous waste manifests dating back to 1990 show that Superior has utilized only two transporters to pick up its hazardous waste. Those transporters deposited waste at three different facilities – none of which are the Site in question. Prior to 1990, Superior operated under a different name.

Because Superior's records indicate that it has never had any contact with the Site or the persons or entities listed in your letter, we are unable at this point to agree to perform or finance activities at the Site. Superior feels confident that its response to questions and requests for documents will clearly demonstrate Superior's lack of connection to the Site. If the EPA is in possession of documentation or information definitively tying Superior to the Site, please forward that information to my office immediately so that Superior may address the specific allegations made against it. Until we receive some response from you indicating what you believe Superior's connection to the Site to be, Superior is not in a position to agree to financially participate in the remediation activities at the Site.

U.S. Environmental Protection Agency

March 14, 2001

Page 2

Superior does, however, wish to retain the ability to join with any PRP groups that form for the purpose of responding to the EPA's request, and asks that it be given notice through my office of any such group formation.

Superior is currently working on its response to your questions and request for production of documents which you will be receiving in the next few weeks. In the meantime, if you have any questions or comments regarding Superior's response to your letter, please do not hesitate to contact me.

Yours very truly,

A handwritten signature in black ink, appearing to read "Phillip E. Hoover". The signature is fluid and cursive, with a long horizontal stroke at the end.

Phillip E. Hoover

PEH/kal

cc: Mr. Jeff Steiner

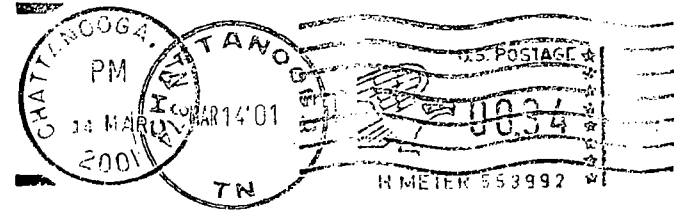
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